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June 28, 2019

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Duracell U.S. Operations, Inc. v. My Imports USA LLC, et al.
Case No. 19-cv-3820 (PGG)

Dear Judge Gardephe:

This firm represents My Imports USA LLC, and Mansur Magsudi.¹ This letter is written pursuant to Rule 1(D)² of Your Honor's Individual Practice Rules, to request an extension of the deadline for the Defendant to answer, move or otherwise respond to the Complaint from June 29, 2019 through to and including July 31, 2019.

This is the Defendant's second request for an extension of this deadline. The parties have been actively engaged in settlement discussions and continue to make progress.

Thank you for your consideration of this request.

Respectfully submitted,


Kieran G. Doyle

¹ In our May 22, 2019 letter to the Court, we incorrectly listed My Imports USA, Inc. as a client. This firm did not and does not represent My Imports USA, Inc. As indicated in the May 30, 2019 Stipulation (ECF 22), My Imports USA, Inc. is represented by The Law Office of Michael Cibella.

² By e-mail dated June 25, 2019 plaintiff's counsel referred to a willingness "to grant a further extension." While preparing this letter, it struck the undersigned counsel that there was some degree of ambiguity in that statement and it was not until this afternoon that the ambiguity was resolved.